

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V.,
NORDVPN S.A., and NORD SECURITY
INC., and TEFINCOM S.A. d/b/a
NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

MOTION FOR ADMISSION *PRO HAC VICE* and AFFIDAVIT

NOW COMES Jodie Herrmann Lawson, (“Local Counsel”) a member in good standing with the Bar with the United States District Court for the Western District of North Carolina (“WDNC”) and moves for the admission of Adam Gahtan (“Applicant”), who seeks permission to represent NORDSEC LTD., NORDSEC B.V., NORDVPN S.A., and NORD SECURITY INC., and TEFINCOM S.A. d/b/a NORDVPN, (“Client”) in this above-captioned case.

By signing this motion, Local Counsel and Applicant certify that:

1. Applicant is a member in good standing of the bar of the highest court of the State or of the District of Columbia where Applicant regularly practices laws, which is New York.

2. Applicant practices under the name of or as a member of the following firm:

Firm Name: Fenwick & West LLP

Mailing Address: 902 Broadway, 18th Floor

City/State/Zip: New York, NY 10010

Telephone Number: 212-430-2600 **Facsimile Number:** 650-938-5200

Email Address (required): agahtan@fenwick.com

3. Applicant certifies that he is also admitted to practice before and remains in good standing with the Courts in the following jurisdictions:

Supreme Court of the United States, New York Southern District Court, New York Eastern District Court, United States Court of Appeals, Federal Circuit, and New York State [NYS Bar No.: 2812501].

4. Applicant certifies he has never been the subject of any formal suspension or disbarment proceedings; never been denied admission *pro hac vice* in this or any other jurisdiction or had *pro hac vice* admission revoked; never had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked; and has never received public discipline by any court or lawyer regulatory organization. If Applicant cannot so certify, the applicant has attached a separate explanation including particular information disclosing the disciplinary history or the denial of admission.

5. Applicant certifies that the client requested Applicant to represent it in this matter, along with Local Counsel.

6. Applicant agrees to be subject to the Orders of the WDNC, including the Local Rules of the WDNC, and amendable to the disciplinary action and the civil jurisdiction of the WDNC in all respects as if the applicant were a regularly admitted and licensed member of the Bar of this Court in good standing.

7. Local Counsel is satisfied that Applicant is qualified to practice before the Bar of the WDNC.

8. Local Counsel has conferred with counsel for the other parties, who have indicated they do not oppose this motion.

9. The required fee for admission *pro hac vice* is being submitted with the filing of this motion.

10. Applicant consents to electronic notification.

By signing this Motion, we so certify.

This, the 24th day of April, 2024.

LOCAL COUNSEL:

APPLICANT

McGUIREWOODS LLP

FENWICK & WEST LLP

/s/ Jodie Herrmann Lawson

/s/ Adam Gahtan

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Counsel for Defendant Nord Security Inc.

Counsel for Defendant Nord Security Inc.

CERTIFICATE OF SERVICE

A copy of the foregoing was electronically filed with the Court this 24th day of April 2024,
and will be served upon counsel of record via the Court's electronic filing system.

/s/ Jodie Herrmann Lawson

Jodie Herrmann Lawson